

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

WYNNE TRANSPORTATION HOLDINGS,  
LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10027 (KBO)

(Jointly Administered)

**Hearing Date: March 11, 2025 at 10:30 a.m. (ET)**

**Obj. Deadline: February 26, 2025 at 4:00 p.m. (ET)**

**NOTICE OF MOTION**

TO: (a) the Office of the United States Trustee for the District of Delaware; (b) counsel for the Official Committee of Unsecured Creditors; (c) counsel to the DIP Lender; (d) the Internal Revenue Service; (e) the United States Attorney's Office for the District of Delaware; (f) the state attorneys general for each state in which the Debtors conduct business; (g) all parties who have requested notice in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002; and (h) the counterparties to the Contracts and Leases.

**PLEASE TAKE NOTICE** that, February 12, 2025, Wynne Transportation Holdings, LLC and its affiliated debtors and debtors-in-possession (the "Debtors") filed the *Debtors' First Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to (A) Reject Certain Executory Contracts and Unexpired Leases Nunc Pro Tunc to February 12, 2025 and (B) Abandon Any Remaining Property at the Rejected Locations; (II) Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases; and (III) Granting Related Relief* (the "Motion").<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that, Objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801, on or before **February 26, 2025 at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the objection upon the undersigned counsel so as to be **received no later than 4:00 p.m. (ET) on February 26, 2025**.

A HEARING ON THE APPLICATION WILL BE HELD ON **MARCH 11, 2025 AT 10:30 A.M. (ET)** BEFORE THE HONORABLE KAREN B. OWENS, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6th FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Wynne Transportation Holdings, LLC (0566), Wynne Transportation, LLC (8255), Coastal Crew Change Company, LLC (9550), WTH Commercial Services, LLC (9379), Southwest Crew Change Company, LLC (8777), Great Plains Crew Change Company, LLC (5926), and Allegheny Crew Change Company, LLC (9234). The Debtors' address is 14110 N. Dallas Parkway, Suite 240, Dallas, Texas 75254.

<sup>2</sup> Copies of documents filed in these chapter 11 cases are available free of charge from the case website maintained at [www.omniagentsolutions.com/Wynne](http://www.omniagentsolutions.com/Wynne).

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 12, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Joshua B. Brooks

Adam G. Landis (No. 3407)

Matthew B. McGuire (No. 4366)

Joshua B. Brooks (No. 6765)

Clifford R. Wood, Jr. (No. 7130)

919 Market Street, Suite 1800

Wilmington, Delaware 19801

Telephone: (302) 467-4400

Email: landis@lrclaw.com  
mcguire@lrclaw.com  
brooks@lrclaw.com  
wood@lrclaw.com

*Counsel to the Debtors and Debtors-in-Possession*